

APPENDIX A

NOTICE OF VIOLATION

TU Electric  
Comanche Peak Steam Electric Station,  
Units 1 and 2

Dockets: 50-445  
50-446  
Operating License: NPF-87  
Construction Permit: CPPR-127

During an NRC inspection conducted on August 27-31, 1990, a violation of NRC requirements was identified. The violation involved failure to meet Technical Specification surveillance requirements for inservice testing. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990) (Enforcement Policy), the violation is listed below:

MISSED SURVEILLANCE REQUIREMENT

Unit 1 Technical Specification 4.0.5 requires as a surveillance requirement that inservice testing of ASME Code Class 2 pumps shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, except where specific written relief has been granted by the Commission. Section XI of the Code requires that the quarterly pump test frequency shall be doubled when the test results fall within the alert range. Technical Specification 4.0.2 requires that each surveillance requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

Contrary to the above, the Code Class 2 residual heat removal pump TBX-RHAPRH-01, was placed in the alert status on June 15, 1990, and the specified surveillance test frequency increase to once per 46 days; however, the surveillance test was not completed until August 14, 1990, which exceeded the specified surveillance interval and the maximum allowable extension permitted by Technical Specification 4.0.2.

This is a Severity Level IV violation. (Supplement 1)(445/9037-01)

Pursuant to the provisions of 10 CFR 2.201, TU Electric is hereby required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,  
this *21st* day of *September* 1990

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